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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: CC Dockets 94-102 and 99-67, ex parte communication

Dear Ms. Dortch:

Roger Hixson, Technical Issues Director for the National Emergency Number Association (“NENA”), and I, as NENA counsel, met yesterday with Greg Cooke and Marcy Greene of the Competition Policy Division of the Wireline Competition Bureau to discuss the application of enhanced 9-1-1 rules and procedures to Multiline Telephone System (“MLTS”) equipment. MLTS issues are among those under discussion in a rulemaking in the referenced dockets.

We discussed the public safety/industry proposal for amending Parts 64 and 68, as filed in July of 2001, and the model state legislation appended to that submission. We spoke from the attached handout outlining activity since 1996.

We noted the availability on the NENA web site, [www.nena.org](http://www.nena.org), of information about state MLTS legislation, and described joint efforts with APCO to collect reports of workplace incidents involving 9-1-1 calls.

Please direct any questions to the undersigned.

Sincerely,

James R. Hobson



**MLTS / Private Switch E 9-1-1 Summary  
July 31, 2003**

- 1996** FCC two day Forum followed by settlement negotiations
- 4/97** NENA, APCO, MMTA, and Ad Hoc group provides report on service recommendations
- 1999** NENA forms a working group to draft Model Legislation and recommendations to the FCC on Part 64/68 requirements for manufacturers. Industry representatives were members of this consensus work group.
- 2000** NENA completes Model Legislation and Part 64/68 proposal, posts Model Legislation on NENA web site for state use.
- Content is more specific, and includes smaller recommended area of minimal identification for emergency response support, based on search time needs identified by public safety. Local notification is included.
- Representatives meet with FCC with a request for action. FCC indicates may support Model concepts, will probably leave service requirements to states for legislative action. More interest expressed in taking action on manufacturers requirements.
- 2001** Further discussions relate to changes occurring with Part 68 overall, with lessening FCC regulatory actions, and effect on MLTS for E9-1-1.
- 2002** FCC assigns new responsibility for the MLTS 9-1-1 area, periodic discussions by phone take place between FCC and NENA.
- 2003** FCC '9-1-1 Scope' inquiry released, includes MLTS section. NENA responds with recommendation to support MLTS system needs for 9-1-1.

**Considerations:**

- **MLTS E9-1-1 is the only major historical service type that is not fully supported or required to be fully supported for emergency calling and caller location identification.**
- **The ability for PBXs to support E9-1-1 is relatively simple and inexpensive, if capability to do so is programmed into future PBX software. A major reason that the service capability is viewed as costly at present is due to the lack of consistent requirements and standards, making implementations dependent on outboard equipment and custom methods.**
- Each Emergency Response Location (ERL) requires an assigned Emergency Line Identification Number (ELIN), preferably capable of inward dialing (call back). Each station needs to be associated with the appropriate ELIN as ANI for a 9-1-1 dialed call in the PBX number assignment process. The selected stations that are associated with a given ELIN are totally flexible, and can apply to any breakdown of work spaces desired.

| Station | ELIN     | ERL   |
|---------|----------|---|
| 2367    | 457-4498 | 3 <sup>rd</sup> Flr, NW quadrant, 111 N 8 <sup>th</sup> St, Town, State |
| 4213    | 457-4498 |   |

When the PBX sees 9-1-1 as the dialed digits, look at the 9-1-1 table and send, as ANI, the ELIN number. In today's E9-1-1 process, the ERL info is the basis of ALI records sent to the ALI data base process. In future 9-1-1 systems, this info may flow with the call.

The basis of the PBX capability can be a relatively simple administrative table. Of course, it is not quite that simple in application, but conceptually not a large effort for the PBX manufacturer, and easy to use for the PBX operator, if standardized.

**It is NENA's view that the expectation for simple, inexpensive, integrated E9-1-1 support within future PBX models will lower user concerns about costs, resulting in less resistance to state legal requirements. That potential will increase interest in passing such laws, hopefully based on NENA's Model Legislation content, so that more standardization in the service from state to state can occur.**

**NENA has been and stands willing to work with the industry to further develop such standards, but the effort needs to be enabled on a national level. We believe such 'directed influence' from the FCC can result in moving MLTS E9-1-1 from relatively static to an active benefit for the millions of people who work within MLTS environments daily, and expect that a 9-1-1 call for help will result in the same level of service available elsewhere.**